

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ESCORT INC.,

Plaintiff,

v.

UNIDEN AMERICA CORPORATION,

Defendant.

CIVIL ACTION NO.: 3:18-cv-00161-N

PATENT CASE

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE
TO AMEND PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to Miscellaneous Order No. 62, Paragraph 3-7, Plaintiff Escort Inc. ("Escort") requests leave to amend its preliminary infringement contentions, and shows good cause as detailed herein. Defendant Uniden America Corporation ("Uniden") is unopposed to this motion.

Escort served its preliminary infringement contentions on June 12, 2018, identifying as accused instrumentalities: (1) Uniden's R3 Extreme Long Range Radar/Laser Detector; (2) Uniden's DFR7 Long Range Radar/Laser Detector; and (3) Uniden's LRD950 Long Range Radar/Laser Detector. In early September 2019, Uniden informed Escort that, in the March 2019 timeframe, Uniden had imported a number of a newly-released model of Long Range Radar/Laser Detector, the Uniden R7. In light of Uniden's indication that it had imported R7 units prior to the expiration of the Patents-In-Suit, Escort informed Uniden that it intended to move for leave to amend its infringement contentions to add the Uniden R7 as an accused instrumentality under substantially the same infringement theory as the Uniden R3. Attached hereto are Exhibits A and B, which chart Escort's contentions for how the Uniden R7 embodies each element of the systems

and methods of U.S Patent Nos. RE40,653 and RE39,038. After reviewing the attached claim charts, Uniden indicated that it is not opposed to Escort's motion for leave to amend.

Accordingly, Escort respectfully requests that the Court enter the attached proposed order granting leave for the amendment.

Dated: October 2, 2019

Respectfully submitted,

By: /s/ Timothy E. Grochocinski

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COUNSEL FOR PLAINTIFF

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CERTIFICATE OF CONFERENCE UNDER L.R. 7.1(b)

Pursuant to Local Rule 7.1(b), I hereby certify that on September 10, 2019, David B. Conrad, counsel of record for Uniden in this matter, indicated that Uniden is unopposed to the relief requested herein. In addition, on October 1, 2019, David Conrad indicated that Uniden does not oppose this motion.

/s/ Timothy E. Grochocinski

Timothy E. Grochocinski

CERTIFICATE OF SERVICE

I hereby certify that the on October 2, 2019, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). I hereby certify that I have served all counsel who are deemed to have consented to electronic service or by another manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Timothy E. Grochocinski
Timothy E. Grochocinski